



RULES PROCESSING TEAM

MAR 07 2002

MARINER ENERGY, INC.

580 WestLake Park Blvd., Suite 1300 Houston, Texas 77079-2643 Tel (281) 584-5500 Fax (281) 584-5555

March 6, 2002

Attn: Rules Processing Team (RPT)
Department of the Interior, Minerals Management Service; MS 4024
381 Elden Street
Herndon, Virginia 20170-4817

Re: Notice of Proposed Rulemaking
Procedures for Dealing with Sustained Casing Pressure
RIN 1010-AC83

Gentlemen:

Mariner Energy, Inc., appreciates the opportunity to comment on the proposed rulemaking. We support the comments on the proposed rulemaking submitted by the Offshore Operators Committee (OOC). Further, we believe that the three-prong approach as outlined in the OOC comments is a more effective method for reducing risk and improving safety in a cost effective manner than a continued prescriptive regulatory approach to sustained casing pressure.

In addition to supporting the OOC comments, we would like to highlight the following areas in the proposed rulemaking that we believe will have serious impacts on our operations in the Gulf of Mexico.

Mariner is an independent operator with a focus on deepwater subsea developments that tie back to host facilities. In several of our projects we have experienced failures of umbilical control lines and/or transducers in systems designed to continuously monitor production annulus pressure. This has required us to work through the DWOP process to implement alternative measures for monitoring annulus pressures that are in all cases wholly thermally induced. Based on our experiences with relatively "simple" systems we foresee even greater problems with prescriptive regulations that require monitoring of all casing annuli in future subsea wells. The OOC comments address this issue and the fact that substantial modifications in current subsea wellhead technology would be required. Our concern is that even if the subsea wellhead design could be somehow reengineered to enable monitoring of multiple annuli, the increased complexity of the instrumentation and controls will eventually lead to multiple failures and costly fixes in an effort to monitor annulus pressures that have little or no effect on the safe operation of the subsea well.

We appreciate your careful consideration of all of the comments concerning this rulemaking.

Sincerely,

Blaine E. Dinger
Manager, Environmental, Health & Safety
(281) 584-5588